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## NATIONAL ANIMAL IDENTIFICATION SYSTEM DRAFT STRATEGIC PLAN

### COMMENTS SUBMITTED BY WYOMING STOCK GROWERS ASSOCIATION

The Wyoming Stock Growers Association (WSGA) has represented the interests of Wyoming's cattle producers for over 133 years. During that time we have worked in close partnership with our members, state animal health officials and federal agencies to address numerous animal disease issues. We welcome this opportunity to comment on a system that, if properly developed, can strengthen our ability to proactively respond to threats to the health of our livestock. At the same time, we express the concerns of our producers that this system will place significant and potentially costly new burdens on their operations.

Since much of the material contained in the Strategic Plan and Program Standards has been developed with considerable industry input, including comments previously submitted by WSGA, we will confine our comments today primarily to responding to the questions posed by APHIS in the Federal Register Notice of May 6, 2005.

*Is a mandatory program necessary?* Our producers understand and support the need for timely and accurate disease traceback. The need to make the system mandatory will be lessened to the extent that a voluntary program is user-friendly, cost effective and meets the needs of the market place. WSGA recommends that APHIS refrain from announcing a mandatory program at this time while clearly emphasizing that failure to achieve a very high level of voluntary compliance with the program within a reasonable time period will result in the program becoming mandatory.

*At what point and how should compliance be assured?* The goals of the program are achieved by having the animals identified before commingling. This does not in all instances require that they be identified prior to movement. The program should retain the flexibility to identify the animals upon arrival at the premises where commingling will occur when this is the most convenient location for the process to occur.

*Are tagging sites a viable option?* Tagging sites, in particular those located at a market terminal, are appropriate in many instances. Many small producers do not have facilities available to handle cattle for tagging purposes. This could further reduce the need for producers to acquire tagging tools and to purchase tags in very small quantities at higher prices.

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*How can direct sales best be inputted into the NAIS?* Primary responsibility for inputting information from direct sales should rest with the purchaser. In Wyoming, where all changes of ownership require a brand inspection, this can be done most effectively by properly integrating the ID program with the existing brand program.

*Should a time frame for identifying animals be considered?* No, a time frame or age limit should not be imposed. Many breeding cattle remain in the same herd without commingling for their entire productive life. The needs of the NAIS can be met by requiring that these animals be identified only when they are finally marketed for slaughter purposes. To require that these animals be tagged prior to that time would be costly and significantly enhance problems associated with tag retention.

*Are the implementation timelines realistic?* This question cannot be precisely answered due to the large number of pending issues surrounding the plan? In particular, the critical issues of assuring confidentiality and funding obligations remain unanswered. The proposed timelines should remain a flexible goal. As implementation proceeds, adjustments will almost certainly be needed.

*What are the most cost-effective and efficient ways for submitting information to the database?* Achieving a high level of compliance requires that all methods of submitting information be made available to those responsible for providing data. Each user will determine the most practical method based on numbers of animals, technological capabilities and practical considerations.

*What information should be protected from disclosure and why?* All information specific to an individual animal, animal ownership and/or premises should be totally protected from disclosure except to authorized animal health officials on an as needed basis. Industry support has been garnered for the NAIS based on the assurance that its sole purpose is to provide for traceback to assist in disease containment and eradication. Voluntary compliance by livestock producers will be minimal unless such confidentiality is assured and fully protected by law. Any other disclosure of information should be only upon the authorization of the producer.

*Should both the seller and buyer report the movement of animals?* As we indicated above, the reporting of information associated with a sale should be primarily the responsibility of the buyer. In Wyoming, this responsibility could be fulfilled by the brand inspector acting on behalf of both parties. Dual reporting will only complicate the system and discourage participation, with little potential gain in accuracy.

*Questions related to a private database.* Based on previous experiences with government housed data, WSGA remains skeptical that complete confidentiality will be assured, even with Congressional action. In Wyoming, we have already passed legislation assuring the privacy of animal ID data when housed in a state agency. Privately managed systems can also provide this level of confidentiality. WSGA urges that the plan establish criteria for multiple privately

managed databases. This criteria should include a requirement that they be managed on a cost recovery basis only. It should be left to the discretion of each state whether to implement a state database system or to authorize participation in one or more private databases. State and private databases can be linked so as to provide a single point of entry for APHIS officials to access data on an as needed only basis. WSGA opposes the establishment of federal databases for this purpose. The costs of operating the database system, whether federal, state or private, should not be born by the industry. Reliable sources of federal or federal/state funding must be identified prior to implementation of the system.

WSGA also takes this opportunity to re-emphasize the importance of addressing the concerns expressed in earlier listening sessions and reiterated on page 11 of the Strategic Plan—financing, confidentiality, flexibility and liability. The NAIS is a complex program that will impact individual producers in varied ways, reflecting the tremendous diversity of livestock operations in this nation. Working cooperatively, USDA, state authorities and industry can achieve program objectives on a voluntary basis. However, if these concerns are not properly addressed, even a mandatory program will not achieve the desired outcome.